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MEMO ENDORSED

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May 31, 2022

VIA ECF

Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

The defendants' request to file BMR-Asiedu 192-193 under seal in connection with their reply in further support of their motion for summary judgment is GRANTED. It is SO ORDERED.


Edgardo Ramos, U.S.D.J
Dated: May 31, 2022
New York, New York

Re: *Trina Asiedu v. Broadreach Medical Resources, et al.*
Case No.: 1:19-cv-11825-ER

Dear Judge Ramos:

This firm represents Defendants Broadreach Medical Resources and J.N. Savasta Corp. in the above referenced matter. Please accept this letter as Defendants' request to file a document under seal to accompany Defendants' reply brief in further support of Defendants' motion for summary judgment as required by Paragraph 3 of Judge Ramos' Individual Practices.

During the course of discovery, Defendants produced a document containing personnel information of other employees, including comparative compensation information (BMR-Asiedu 192-193). Pursuant to the parties' Stipulated Confidentiality Agreement and Protective Order ("Confidentiality Agreement"), Defendants designated this document as Confidential because it contains personal information regarding non-parties to this lawsuit. (Wieselthier Cert. at ¶¶ 2-3). Plaintiff did not challenge this designation. (*Id.* at ¶ 4).

On June 1, 2022, Defendants will be filing a reply brief in further support of Defendants' motion for summary judgment. In support of this brief, Defendants intend to rely upon the compensation information contained in BMR-Asiedu 192-193 and produce it as an exhibit. (*Id.* at ¶ 7). Prior to doing so, Paragraph 10 of the Confidentiality Agreement requires Defendants to publicly file a redacted copy of the document and file an unredacted copy under seal. (*Id.* at ¶ 8). It is necessary to file this Confidential document under seal to protect the privacy of individuals who are not party to this lawsuit and whose compensation information Plaintiff raised in her opposition to Defendants' motion for summary judgment. (*Id.* at ¶ 9).

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Accordingly, Defendants respectfully request that the Court grant this motion and permit Defendants to file BMR-Asiedu 192-193 under seal to protect the confidential information contained therein.

Thank you for Your Honor's consideration.

Respectfully submitted,

Sarah Wieselthier
For FISHER & PHILLIPS LLP

SALW:epg
Enclosure